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19 September 2011

Freepost 1201
RLTS Submission
Environment Canterbury
PO Box 345
Christchurch

rlts@ecan.govt.nz

RE: SUBMISSION ON THE DRAFT CANTERBURY REGIONAL LAND TRANSPORT STRATEGY 2012-2042

Silver Fern Farms appreciates this opportunity to provide feedback on the Draft Canterbury Regional Land Transport Strategy 2012-2042.

Silver Fern Farms Limited is the major Meat Processing Company in New Zealand and transport is vital to the sustainability of our operations and those of our farmer partners. Proximity to good transport networks and links is essential for maximising efficiency and keeping costs down. Transit time to market is a critical element of our supply chain, as is transport time from the farmer supplier to processing. It is important that the competitiveness of the domestic and international supply chain is maintained.

Silver Fern Farms has six facilities in the Canterbury region, with its Belfast, Canterbury, Vital and Islington operations in Christchurch and two rural based operations located in the townships of Fairton and Pareora. In addition to this, many of Silver Fern Farms suppliers and farmers are based in the wider Canterbury region.

Planning and investment in our road, rail, air, and sea links is essential to maintaining an efficient and effective transport network. Silver Fern Farms generally supports the draft strategy for these reasons; please see the attached submission for details.

If you wish to clarify any of the matters raised, or just wish to further discuss any of the points made, please do not hesitate to contact me.

Kind regards

Alison Johnstone
Environmental Officer



Ali Johnstone | Environmental Officer | Silver Fern Farms Limited

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Silver Fern Farms - 100% Made of New Zealand

**Submission on the Draft
Canterbury Regional Land
Transport Strategy 2012-2042
(Draft RLTS)**

FOR OFFICE USE ONLY

Submitter ID:

File No:

Return your signed submission by 4.00pm, 23 September 2011 to:

Freepost 1201
RLTS Submission
Environment Canterbury
P O Box 345
Christchurch

OR: rltts@ecan.govt.nz

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Contact name and postal address for person making submission (if different from above):

PO Box 30, Ashburton, 7700 _____

Signature:  _____ Date: 19 September 2011 _____

(Signature of person making submission or person authorised to sign on behalf of person making the submission)

Please note:
(1) all information contained in this submission will be publicly available.

- B** I do not wish to be heard in person at a public hearing in support of my submission; OR
 I do wish to be heard in person at a public hearing in support of my submission.

<p>C (1) The specific provisions of the Draft RLTS that my submission relates to are: (Specify page number and section on which you are submitting).</p>	<p>(2) My submission is that: (State concisely whether you support or oppose each separate provision being submitted on, or wish to have amendments made and the reasons for your views.)</p>	<p>(3) I seek the following amendments or decisions: (Please give precise details for each comment. The more specific you can be the easier it will be for the Regional Transport Committee to understand your concerns.)</p>
<p>Page 8 Long Term Strategic Direction</p>	<p>Support with amendment. The RLTS recognises that “the primary production sector contributes significantly to the national and Canterbury economy” (p16)</p> <p>Forecast growth in this sector includes an increase in stock numbers particularly of dairy and beef herds. Larger stock numbers will inevitably lead to increased stock movements not only to meat processing facilities but also between farms. Stock Truck effluent disposal sites play an important role in avoiding effluent spills on the regions roads. Silver Fern Farms feel that the regional significance of primary production and the importance of the regions stock truck effluent network should be recognised in the RLTS and it’s maintenance and improvement provided for.</p>	<p>Silver Fern Farms suggest that an additional sought outcome be added, worded or something similar: <u>Sought Outcome</u> Stock truck effluent disposal network protected and maintained. <u>How the strategic direction contributes</u> Maintenance and enhancement of stock truck effluent disposal network, including the addition of appropriately sited facilities (using fair funding mechanisms) will ensure the timely and appropriate disposal of stock truck effluent. And all other consequential amendments.</p>
<p>Page 8 Long Term Strategic Direction</p>	<p>A reliable, fit for purpose network is essential to ensure the efficient movement of goods. Silver Fern Farms supports the ongoing maintenance and renewal of the network, and the consequent reduction of the duration and frequency of disruptions to the network.</p>	<p>Retain the intent of sought outcome for improving the resilience of the transport network.</p>

<p>Page 9 Long Term Strategic Direction</p>	<p>Silver Fern Farms move goods and freight all over the country. In order to meet scheduling and shipping deadlines, accurate and reliable information on travel times are paramount for logistical planning.</p> <p>As such Silver Fern Farms supports the recognition of the importance and inclusion of maintained Regional and inter-regional journey time reliability on key freight routes.</p>	<p>Retain the intent of sought outcome for Regional and inter-regional journey time reliability</p>
<p>Page 9 Long Term Strategic Direction</p>	<p>Silver Fern Farms supports the inclusion of maintaining and protecting freight hubs.</p> <p>Transport is vital to the operations of Silver Fern Farms, proximity to good transport networks and links maximises transport efficiency and keeps costs down. Therefore, Silver Fern Farms support the inclusion of</p> <p><i>“Planning that avoids incompatible land uses around freight hubs and networks that are linked directly into hubs will ensure that freight operations can continue to function effectively.”</i></p> <p>Efficient infrastructure and good connections are essential in providing reliable transport routes, which assists in logistical planning and meeting scheduling requirements.</p>	<p>Retain the intent of sought outcome for protecting and maintaining freight hubs.</p>
<p>Page 16 Freight Modes</p>	<p>Silver Fern Farms is one of New Zealand’s largest meat processing and export operations. Primary production comprises the backbone of the business and as such Silver Fern Farms supports the statement that:</p> <p>“the primary production sector contributes significantly to the national and Canterbury economy”</p>	<p>Retain recognition of the regional significance of the primary production sector and the importance freight transport plays</p>

<p>Page 17 Freight Modes</p>	<p>and the recognition of the “vital” role that freight transport plays in servicing the primary production sector. Timely delivery of goods is essential for the efficient and cost effective running of the operation.</p>	<p>Retain recognition of the significance of the four transport modes to the region</p>
<p>Page 23 Integration with Land Use</p>	<p>Silver Fern Farms utilises all four of the main transport modes; road, rail, air and sea and as such supports the recognition of their regional significance.</p> <p>Also of significance is the streamlined connection from one transport mode to the other.</p> <p>Transport timing to market is very important for product with limited shelf life and similarly stock movement delays have adverse impacts on animal welfare.</p>	<p>Retain recognition that incompatible land use can have an adverse effect on the transport system.</p>

Add further pages as required.

